

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 6/10/2014, 6/11/2014, 6/12/2014	Man Days: 3
Inspection Unit: Marion	
Location of Audit: Marion	
Exit Meeting Contact: Dallas Jett	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Valerie Schwing	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Dallas Jett	Sr. Quality Assurance Consultant	

Gas System Operations	Status
Gas Transporter	Ameren Illinois
Annual Report (Form 7100.1-1) reviewed for the year:	2013
Unaccounted for Gas	0.32%
Number of Services	824016
Miles of Main	16941
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
Operating Pressure (Feeder)	Various
Operating Pressure (Town)	Various
Operating Pressure (Other)	Various

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MAOP (Feeder)		Various
MAOP (Town)		Various
MAOP (Other)		Various
Does the operator have any transmission pipelines?		Yes
Regulatory Reporting Records		Status
<u>Category Comment:</u>		
The regulatory reporting records are kept at the Pawnee location.		
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Checked
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Checked
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Checked
Did the operator have any plastic pipe failures in the past calendar year?		Not Checked
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Not Checked
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Checked
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Checked
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Not Checked
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u>		
The records for the Drug and Alcohol Plan are kept in St. Louis.		
TEST REQUIREMENTS		Status
<u>Category Comment:</u>		
Staff reviewed the pressure test documentation for the calendar year 2012 and 2013.		
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory

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[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
UPRATING		Status
<u>Category Comment:</u> <i>Ameren has not done any uprating for the Marion or Carbondale areas in 2012 or 2013.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
<u>Category Comment:</u> <i>The operation records are kept at the Pawnee location.</i>		
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Not Checked
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Unsatisfactory
<u>Issue Comment:</u> <i>On June 11, 2014, Staff reviewed Ameren Illinois Gas Leak Case Field Reports. During this review Staff noted that many of the sketches on these reports were hard to read and the repair information lacked detail. In order for this issue to be closed the Marion and Carbondale areas must have a training session on proper documentation for Gas Leak Case Field Reports.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
<u>Category Comment:</u> <i>The continuing surveillance records are kept at the Pawnee location.</i>		
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Not Checked
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<u>General Comment:</u>		

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<i>Ameren has no known cast iron in the system.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
<u>General Comment:</u> <i>Ameren has no known cast iron in the system.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<u>General Comment:</u> <i>Ameren has no known cast iron in the system.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<u>General Comment:</u> <i>Ameren has no known cast iron in the system.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>The OQ records are kept at the Pawnee location.</i>		
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u> <i>The damage prevention records are kept at the Pawnee location.</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked

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Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
<u>Category Comment:</u> <i>The emergency plan records are kept at the Pawnee location.</i>		
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Not Checked
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Not Checked
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Checked
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
PUBLIC AWARENESS PROGRAM - RECORDS		Status
<u>Category Comment:</u> <i>The public awareness records are kept at the Pawnee location.</i>		
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
ODORIZATION OF GAS		Status
<u>Category Comment:</u> <i>Staff reviewed the sniff test documentation for 2012 and 2013. Staff also reviewed the tank level monthly inspections on the Ameren's Gas Compliance database.</i>		
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory

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[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Satisfactory
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Satisfactory
PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Satisfactory
<u>General Comment:</u> Staff reviewed distribution critical area patrols for 2012 and 2013.		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Satisfactory
<u>General Comment:</u> Staff reviewed distribution critical area patrols for 2012 and 2013.		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
<u>General Comment:</u> Staff reviewed the operator's business district surveys for 2012 and 2013.		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
<u>General Comment:</u> Staff reviewed randomly selected leakage surveys for 2012 and 2013, The Marion and Carbondale areas do not contain unprotected pipelines.		
YARD LINES - RESIDENTIAL		Status
<u>Category Comment:</u> Staff reviewed the yard line surveys that were due and were conducted in 2013. There were not any yard line surveys done in 2012.		
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection	Satisfactory

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	requirements, has the operator surveyed each line within the required leakage survey intervals?	
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<u>Category Comment:</u>		
Staff reviewed randomly chosen work orders for 2012 and 2013.		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
<u>General Comment:</u>		
The Marion and Carbondale areas do not have pipelines that cross commercially navigable waterways.		
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u>		
Staff reviewed the pressure and regulation station inspections on the Gas Compliance database for 2012 and 2013.		
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating	Not Checked

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	station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	
<u>General Comment:</u> <i>Each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station is equipped with a ERX and is sent to a different location with the SCADA system.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Checked
<u>General Comment:</u> <i>Each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station is equipped with a ERX and is sent to a different location with the SCADA system.</i>		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the valve inspection records for 2012 and 2013.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the inspection records on the Gas Compliance Database for the single vault on College St for 2012 and 2013.</i>		
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Checked
<u>General Comment:</u> <i>The records regarding failures are located at the Pawnee location.</i>		
WELDING OF STEEL PIPE		Status
<u>Category Comment:</u> <i>The welding qualification records are kept at the Pawnee location.</i>		
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder	Not Checked

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	qualification documentation as required?	
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
JOINING OF MATERIAL OTHER THAN WELDING		Status
Category Comment:		
The joining records are kept at the Pawnee location.		
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Not Checked
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Not Checked
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Not Checked
CORROSION CONTROL RECORDS		Status
Category Comment:		
Staff reviewed isolated test points and cathodic protection readings for the Carbondale and Marion locations in the Ameren GCS database. Staff reviewed Atmospheric Corrosion Records for 2012 and 2013. Staff also reviewed rectifier inspections for Marion, Carbondale, Elizabethtown, and Cave in Rock.		
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Satisfactory
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Satisfactory
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
General Comment:		
Staff reviewed atmospheric corrosion records for 2012 and 2013 in the Gas Compliance Database.		
[192.491][192.465(e)]	Has the operator maintained documentation of	Not Applicable

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	unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	
<u>General Comment:</u>		
<i>Ameren does not have any unprotected pipelines in the Marion or Carbondale areas.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Satisfactory
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Applicable
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Satisfactory
TRAINING - 83 IL ADM. CODE 520		Status
<u>Category Comment:</u>		
<i>The training records are kept at the Pawnee location.</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked

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[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked